

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

LESLIE COURTNEY

Plaintiff,

v.

C.A. No. 1:24-cv-12843-PBS

PAPA, INC.

Defendant.

**PLAINTIFF, LESLIE COURTNEY'S MOTION TO COMPEL  
RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION**

Pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure, Plaintiff Leslie Courtney ("Plaintiff" or "Ms. Courtney") hereby moves for an order compelling Defendant, Papa, Inc. to produce documents and/or respond to Plaintiff's First Request for Production ("Requests") served on Defendant on April 25, 2025.

To date, Defendant has not responded to the Requests nor has it served any responsive documents, thus prompting the preparation and submission of this Motion. The Memorandum of Law in support of this Motion is filed contemporaneously herewith.

**Local Rule 37.1 Certification:** Plaintiff and the undersigned certify their attempt to comply with the conferral requirement in Local Rule 37.1, but Defendant's counsel failed to reply to Plaintiff's counsel's written correspondence.

*[Signatures appear on the following page.]*

Respectfully submitted,

LESLIE COURTNEY

By her attorneys,

/s/ Timothy C. Cavazza

/s/ Jessica A. Sclafani

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Dated: June 12, 2025

**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 12, 2025.

/s/Timothy C. Cavazza

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